

# **Exhibit A**

## **Declaration of Paul T. Saba**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**CABATECH, LLC,**

**Plaintiff,**

**v.**

**NEXTLIGHT, LLC,**

**Defendant.**

**Case No. 1:22-cv-00059-MWM**

**Honorable Matthew W. McFarland**

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**DECLARATION OF PAUL T. SABA IN SUPPORT OF  
MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT**

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I, Paul T. Saba, Esq., having been first duly sworn and cautioned, state as follows:

1. I am over eighteen years of age, I am competent to testify, and I have personal knowledge of the facts stated herein;
2. NextLight has substantially failed to fulfill its financial obligation to myself and Stagnaro, Saba & Patterson, Co., L.P.A. (collectively, "SSP") concerning SSP's services as counsel;
3. NextLight has been given reasonable warning of SSP's intent to withdraw absent fulfillment of its financial obligation;
4. SSP has sent NextLight several emails concerning NextLight's failure to fulfill its financial obligation;
5. Additionally, on December 19, 2023, SSP sent a letter to NextLight advising of SSP's intent to withdraw as counsel and that NextLight should immediately retain new counsel.

FURTHER AFFIANT SAYETH NAUGHT.

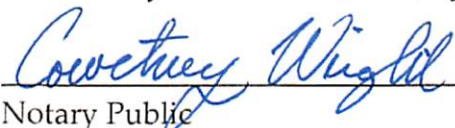
  
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Paul T. Saba, Esq.

STATE OF OHIO                    )  
  ) SS:  
COUNTY OF HAMILTON        )

BE IT REMEMBERED that the foregoing instrument was acknowledged before me, a notary public in and for said state, this 21st day of December, 2023, by Paul T. Saba.



COURTNEY WRIGHT  
Notary Public, State of Ohio  
My Commission Expires:  
December 18, 2027

  
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Notary Public